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July 16, 2008

VIA HAND DELIVERY

The Honorable Gregory M. Sleet
United States District Court for
The District of Delaware
844 North King Street
Wilmington, DE 19801

RE: *Wisnewski et al. v. Ocean Petroleum et al.*, C.A. No. 08-00026
(GMS)

Dear Judge Sleet:

Attached hereto please find a copy of the letter and Rule 26(f) Discovery Plan hand delivered to your chambers on May 12, 2008.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,



Kenneth L. Dorsney

KLD/smb
Enclosure

EXHIBIT A

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May 12, 2008

VIA HAND DELIVERY

The Honorable Gregory M. Sleet
United States District Court
for the District of Delaware
844 North King Street
Wilmington, DE 19801

RE: Wisnewski et al. v. Ocean Petroleum et al., C.A. No. 08-00026 (GMS)

Dear Judge Sleet:

As required by Federal Rule of Civil Procedure 26(f), the attorneys of record for Plaintiffs and Defendants held a conference with respect to their claims and discovery-related matters. Enclosed herewith is the proposed Discovery Plan setting forth deadlines for the commencement and completion of discovery, as agreed upon by the parties. The parties respectfully request that Your Honor enter the Discovery Plan governing the timing of discovery.

If the Court has any questions or concerns, we remain available.

Respectfully submitted,



Kate Schulhaus Keller

Enclosures

cc: David Malatesta, Esquire (via hand delivery)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EDWARD WISNIEWSKI and)	
MARY WISNIEWSKI, Co-Administrators)	C.A. No.: 1:08-cv-00026 (GMS)
of the Estate of Eric E. Wisniewski,)	
Deceased,)	
Plaintiffs,)	JURY TRIAL DEMANDED
v.)	
OCEAN PETROLEUM, L.L.C., and)	
BRUCE PREDEOUX,)	
Defendants.)	

RULE 26(F) DISCOVERY PLAN

This Discovery Plan is based upon the agreement of the parties after having met and conferred pursuant to Federal Rule of Civil Procedure 26(f).

IT IS HEREBY ORDERED that:

1. The parties shall provide the initial disclosures under Fed. R. Civ. P. 26 (a)(1) no later than twenty-one (21) days after the parties Rule 26(f) discovery planning conference. Any extension of the deadline to provide initial disclosures must be by Order of the Court and will only be granted for good cause shown.
2. All fact discovery shall be completed no later than one hundred twenty (120) days after the date of entry of this Order.
3. Within sixty (60) days after the completion of the parties' fact discovery, Plaintiff shall identify and provide its expert reports.
4. Within sixty (60) days after Plaintiff provides its expert reports, Defendants shall identify and provide their expert reports to Plaintiffs.

5. All depositions of Plaintiffs' experts must be conducted within two hundred ten (210) days after the date of entry of this Order.

6. All depositions of Defendants' experts must be conducted within two hundred forty (240) days after the date of entry of this Order.

7. The Plaintiff shall immediately notify Chambers upon the settlement, dismissal or other resolution of this civil matter and shall file with the Court appropriate evidence of such resolution as soon thereafter as is feasible. Plaintiff shall immediately advise Chambers, in writing, of any occurrence or circumstance which Plaintiff believes may suggest or necessitate the adjournment or other modification of the trial setting.

8. Upon completion of the Scheduling Conference required by Federal Rule of Civil Procedure 16 and Local Rule 16.2(b), the parties will submit a proposed Scheduling Order in substantial compliance with this Court's form Scheduling Order.

9. Deadlines contained in this Discovery Plan may be extended by Stipulation between the parties.

10. The Plaintiff shall serve this Discovery Plan on Defendant within five (5) business days after the entry of this Order.

Dated: _____, 2008
Wilmington, DE

Judge Gregory M. Sleet